

## **STATEMENT OF BASIS (AI No. 83648)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0122319 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** IESI LA Corporation  
IESI Natchitoches Hauling  
P.O. Box 38  
Natchitoches, LA 71458

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Yvonne Baker

**DATE PREPARED:** August 28, 2006

### **1. PERMIT STATUS**

#### **A. Reason For Permit Action:**

Issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

**B. NPDES permit -** NPDES permit effective date: N/A  
NPDES permit expiration date: N/A  
EPA has not retained enforcement authority.

**C. LPDES permits -** LAG480184  
LPDES permit effective date: October 15, 2002  
LPDES permit termination date: July 5, 2005

**D. Date Application Received:** July 19, 2006

### **2. FACILITY INFORMATION**

#### **A. FACILITY TYPE/ACTIVITY - solid waste collection facility with truck maintenance**

IESI Natchitoches Hauling performs administrative and maintenance activities associated with the collection and transportation of municipal and commercial solid wastes. Maintenance activities include vehicle and container repairs. Collection trucks are parked on-site. Approximately 15-20 trucks use the facility weekly. The vehicles are washed using a low volume/ high pressure washer that has a water use rate of approximately 2 gallons/minute. The facility plans to discharge vehicle washwater and industrial stormwater. The vehicle washwater will be treated by an oil/water separator prior to discharge.

#### **B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: II (BPJ to 5 points due to minimal flow)
3. Wastewater Type: II
4. SIC code: 4212, 7542

**C. LOCATION -** 1747 Highway 6, Natchitoches, Natchitoches Parish  
Latitude 31° 48' 34.2", Longitude 93° 05' 11.9"

### **3. OUTFALL INFORMATION**

#### Outfall 001

Discharge Type: vehicle washwater

Treatment: oil/water separator

Location: at the point of discharge from the oil/water separator prior to mixing with waters of the state

Flow: 200 GPD

Discharge Route: via ditch to local drainage thence into Bayou Ile aux Vaches, thence into Cane River

### **4. RECEIVING WATERS**

STREAM - via ditch to local drainage thence into Bayou Ile aux Vaches, thence into Cane River

BASIN AND SEGMENT - Red River Basin, Segment 101101

DESIGNATED USES - a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife  
d. drinking water supply\*  
f. agriculture

\*Drinking Water Supply is listed as a designated use of Segment 101101 (Cane River - above Natchitoches to Red River). However, this designated use is applicable only if the discharge is directly into the named waterbody and not into a tributary or distributary of the waterbody, per LAC33:IX.1111.D.

### **5. TMDL STATUS**

Subsegment 101101, Cane River - above Natchitoches to Red River, is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

### **6. PROPOSED EFFLUENT LIMITS**

BASIS - See Rationale below.

### **7. COMPLIANCE HISTORY/COMMENTS**

1. WQMD – An inspection on July 21, 2004 noted the facility was not collecting effluent samples or submitting DMRs as required by their permit.

2. DMR Review/Excursions – No DMRs on file as of August 28, 2006.

### **8. ENDANGERED SPECIES**

The receiving waterbody, Subsegment 101101 of the Red River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the migratory waterfowl, which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated October 21, 2005 from Watson (FWS) to Gautreaux (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the migratory waterfowl.

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Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

## **9. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

## **10. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

## **11. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.  
Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

### Rationale for IESI LA Corporation

1. **Outfall 001** - vehicle washwater (estimated flow is 200 GPD)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Daily Max (mg/l)	<u>Reference</u>
Flow (GPD)	---: Report	
BOD <sub>5</sub>	---: 45 mg/l	Similar discharges*(BPJ)
Oil & Grease	---:15 mg/l	Similar discharges*(BPJ) and LAG480000
COD	200 mg/l: 300 mg/l	Similar discharges*(BPJ) and LAG480000
TSS	---:45 mg/l	Similar discharges*(BPJ) and LAG480000
Visible Sheen	---: No Presence	Similar discharges*(BPJ) and LAG480000
pH	6.0 - 9.0 su	Similar discharges*(BPJ) and LAG480000

**Treatment: oil/water separator**

**Monitoring Frequency:** Quarterly for all parameters at the point of discharge from the oil/water separator prior to mixing with waters of the state.

**Limits Justification:** The limit and monitoring frequency for BOD<sub>5</sub> are based on current guidance for similar discharges from other facilities. The limits and monitoring frequencies for all other parameters are based on current guidance for similar discharges from other facilities and the Light Commercial General Permit (LAG480000), Schedule B.

\* Existing permits for similar outfalls

BPJ Best Professional Judgement

su Standard Units

**NOTE**

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

### STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water shall not be required to obtain and LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.h, facilities classified as SIC code 4212 are not considered to have storm water discharges associated with industrial activity unless they have "vehicle maintenance shops, equipment cleaning operations, or airport deicing operations." This facility does have vehicle maintenance shops and equipment cleaning operations.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).